

Banc  
Ftc  
log  
Cowan

TELEX TO MR. G.C. ADKINS, LEGAL, NEW YORK

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FROM: H. GAISCH 10TH JULY, 1984

SUBJECT: TESTING METHODOLOGY

DEAR CARL,

COULDN'T WE PERHAPS SUGGEST TO THE FTC A SECOND  
POSSIBILITY, AS AN ALTERNATIVE TO THE 'LEAKY HOLDER'  
SOLUTION, ALONG THE FOLLOWING LINES?

QUOTE:

AMENDMENT OF THE CIGARETTE TESTING METHODS (FTC, LGC,  
CORESTA, ISO) IN ORDER TO MAKE THEM APPLICABLE TO  
CIGARETTES WITH BY-PASS FILTERS.

1. THE COMMERCIAL INTRODUCTION OF CIGARETTES WITH BY-PASS  
FILTER VENTILATION NECESSITATES AN AMENDMENT OF THE  
CIGARETTE TESTING METHODOLOGY IN ORDER TO ASSURE  
ANALYTICAL RESULTS THAT ALLOW THE CORRECT RANKING OF  
PRODUCTS.
2. IN ORDER TO TAKE INTO ACCOUNT THE TWO POSSIBLE  
EXTREMES OF FULL AND ZERO BY-PASS VENTILATION, TWO SMOKING  
RUNS MUST BE CARRIED OUT, ONE IN WHICH THE CIGARETTES ARE  
HELD IN A TRADITIONAL HOLDER, AND ONE WITH A HOLDER FITTED  
WITH AN O-RING, WHICH CLOSSES A 1MM ANNULAR PORTION AT THE  
PERIPHERY OF THE MOUTH END OF THE CIGARETTE (E.G.  
'COPELAND HOLDER'). IN ORDER TO CALCULATE THE RESULTS,  
THE MEAN OF THE ANALYTICAL VALUES (TPM, SMOKE NICOTINE,  
'TAR', ETC.) FOR THE TWO RUNS IS TAKEN.
3. THIS PROCEDURE GIVES IDENTICAL RESULTS FOR CIGARETTES  
WITHOUT BY-PASS VENTILATION COMPARED TO TRADITIONAL  
METHODOLOGY. HOWEVER, FOR CIGARETTES WITH BY-PASS  
VENTILATION, VALUES ARE OBTAINED WHICH ALLOW A PROPER  
COMPARISON OF ALL CIGARETTES.

UNQUOTE.

THE 'TAR' VALUES FOR 'BARCLAY' OBTAINED IN SUCH A WAY  
WOULD BE 6 - 7 MG, AND FALL WITHIN THE RANGE CONSIDERED BY  
THE FTC AS BEING CORRECT. THE SOLUTION WOULD BE, IN  
SPIRIT, IN LINE WITH THE PROPOSAL MADE BY DR. SIEGWART OF  
THE FEDERAL HEALTH OFFICE IN BERN, WHICH IS BASED ON THE  
RATIONAL OF TAKING INTO ACCOUNT THE TWO POSSIBLE EXTREMES,  
OF MEASURING THEM, AND OF HALVING THEIR EFFECT. THIS  
AVOIDS AN ARBITRARY CHOICE OF HOLDER CONDITIONS, WHICH  
COULD NEVER BE SUPPORTED RATIONALLY IN THE CASE OF  
LITIGATION.

KIND REGARDS, HELMUT GAISCH

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